

# **EXHIBIT 2**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
-----X  
MARK I. SOKOLOW, et al.,  
  
PLAINTIFFS,  
  
-against- Case No:  
04CV397 (GBD) (RLE)  
  
THE PALESTINE LIBERATION ORGANIZATION, et  
al.,  
  
DEFENDANTS.  
-----X

DATE: October 14, 2012  
TIME: 1:40 P.M.

DEPOSITION of SHIFRA GOLDBERG,  
taken by the Defendants, pursuant to Notice  
and to the Federal Rules of Civil  
Procedure, held at the offices of Morrison  
& Foerster, 1290 Avenue of the Americas,  
New York, New York 10104, before Robert X.  
Shaw, CSR, a Notary Public of the State of  
New York.

1 Shifra Goldberg

2 relevant to the claims that you're making?

3 A. They've asked.

4 Q. They asked. And have you  
5 searched for those?

6 A. I don't have.

7 Q. And you don't have those  
8 records.

9 Mrs. Goldberg, are you claiming  
10 that you've lost wages as a result of your  
11 husband's death?

12 MR. SOLOMON: Objection. By  
13 counsel, I don't think she's making  
14 that claim.

15 MS. MATTA: She's making a  
16 claim for past income.

17 MR. SOLOMON: She's making a  
18 claim for past income? Okay. Then,  
19 go ahead. Are you making a claim for  
20 past income?

21 THE WITNESS: I don't know. I  
22 don't remember.

23 MR. SOLOMON: Yes or No, just  
24 answer, say Yes or No.

25 Do you want to be paid money

1 Shifra Goldberg

2 for time that you lost from work as a  
3 result of the terrorist attack?

4 THE WITNESS: That I lost from  
5 work?

6 MR. SOLOMON: Yes.

7 THE WITNESS: What do you mean?

8 MR. SOLOMON: Were you working?

9 THE WITNESS: No.

10 MR. SOLOMON: Okay. So, what's  
11 the answer?

12 THE WITNESS: No.

13 MR. SOLOMON: Okay.

14 Q. Okay. You're the administrator  
15 of your husband's estate?

16 A. Yes.

17 MR. SOLOMON: Off the record.

18 (Whereupon, a short recess was  
19 taken.)

20 MS. MATTA: Back on the record.

21 Q. So, before we went off the  
22 record, I was asking you if you were the  
23 administrator of your husband's estate, and  
24 you said you were.

25 A. Yes.